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C.M. Florence, AICP
Oasis Associates, Inc.
3427 Miguelito Court
San Luis Obispo, CA 93401

SUBJECT: Addendum to the Supplemental Floristic Inventory and Rare Plant Survey, and Updated Oak Tree Impact Analysis for the Excelaron LLC Huasna Site Well Pad Development and Porter Ranch Haul Road, County of San Luis Obispo, California

Dear Ms. Florence:

Sage Institute, Inc., (SII) is pleased to submit this addendum to the July 21, 2009 supplemental floristic inventory/rare plant survey, and updated oak tree impact analysis letter report of findings (7/21/2009 botanical report) conducted for the Excelaron Mankins Ranch well pad development project and use of the Porter Ranch road for tanker truck trips and additional project related traffic (proposed project). SII is providing this letter in response to items 13 and 14 in the August 20, 2009 letter from San Luis Obispo County.

Item 13 – Tarplant Mitigation Success

As discussed in Section 3.2 of the 7/21/2009 botanical report, the currently accepted taxonomy for the tarplant observed on the Mankins and Porter ranches is the widespread paniculate tarplant (*Deinandra paniculata)* that ranges from San Diego County north to San Luis Obispo County. The leafy tarplant (*Deinandra increscens* ssp. *foliosa)* is no longer a taxonomically recognized subspecies. Dr. Keil has labeled the specimens accessioned at the Hoover Herbarium, which were collected from his 2008 survey and originally considered and labeled as the leafy tarplant (*D. incresecens* ssp. *foliosa*) ,under the currently accepted name of paniculate tarplant (*Deinandra paniculata).* This species is considered a CNPS List 4 species and we provided the opinion that impacts on this species should be considered to be less than significant given its wide distribution and occurrence mostly in previously disturbed areas. The proposed "scoop and drop" mitigation without success criteria was recommended to further reduce the already less than significant impacts.

SII suggests that the "scoop and drop" method would be successful and adequate mitigation based on the CNPS List 4 status and based on our observations of the paniculate tarplant in previously disturbed areas of the Mankins Ranch. We observed this species on Well Pad 2, the shipping site, and in and along the roadside edges. As stated in Section 3.3.1 of the 7/21/2009 botanical report, based on SII botanists observations in 2009, this plant appears to readily colonize disturbed areas, hence our opinion that this would be a successful method to salvage the seed resource from impacted areas.

Item 14 – Clarification of the Extent of Survey For CalFire Clearance Zone

In short, the SII 2009 survey adequately covered the potential 30-foot to 100-foot CalFire clearance zone in areas of proposed improvements. While our initial floristic inventory survey area for visual coverage was an approximately 50-foot zone, where the paniculate tarplant was observed, the maximum extent of the occurrence was surveyed and mapped as shown on Figures BOT-2, BOT-3, and BOT-4. As such, our survey adequately addressed the 30 to 100 foot CalFire potential clearance zone to evaluate the paniculate tarplant occurrence and potential impacts.

The paniculate tarplant is a grassland species so most occurrences on the Mankins Ranch were limited to grassland areas and did not extend into the shrub or tree dominated habitats that border most of the project area. The Porter Ranch occurrences were mapped to the extent observed along the road that often were beyond a 100-foot zone. As we discussed in the 7/21/2009 botanical report there could be additional occurrences in areas outside of our survey limits beyond the mapped polygons.

Our survey focused on areas of potential disturbance such as the well pads, shipping site, the access road around the Mankins Ranch areas proposed for facilities to be developed, and along Porter Ranch road for potential turnouts. We reviewed our data and have added one additional occurrence along the first part of the Mankins Ranch access road as shown in the northwest corner of the attached Figure Bot-1 REV. This occurrence was in the field above the road grade and was behind a fence in a grassland pasture with cattle grazing. We did not cross the fence to survey this area as it was our understanding that there are no improvements proposed along this reach of road.

In conclusion, based on the SII 2009 botanical resources survey and reporting, this addendum and the 7/21/2009 botanical report adequately and thoroughly documents and analyzes the occurrence and potential impacts on the paniculate tarplant. As such, no additional rare plant surveys should be needed for the EIR evaluation of the proposed project. Thank you for the opportunity to assist with the environmental review process for this project. Please call me directly if you have any questions or need additional information.

Very truly yours,

David K. Wolff
Principal Ecologist
Certified Professional Wetland Scientist

Attachments: Figure BOT-1 REV